

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Angelique D. Bridges	:	Chapter 13
	:	No.: 19-16106-MDC
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY ALLY BANK LEASE TRUST

Debtor, Angelique D. Bridges, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Ally Bank Lease Trust hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. Debtor requests an Order relieving them of all remaining liabilities after Relief is granted.
8. Admitted.
9. Admitted.
10. Admitted. Debtor requests an Order relieving them of all remaining liabilities after Relief is granted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.

15. Denied.

16. Denied.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: February 1, 2022

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West**  
Standing Chapter 13 Trustee  
Electronic Notice

**Regina Cohen, Esq.**  
Attorney for Movant  
Electronic Notice to *rcohen@lavin-law.com*

Dated: February 1, 2022

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
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